TOWN OF CALEDON
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October 29, 2026

Town of Caledon
Planning and Development Services
6311 Old Church Road
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Attention: Sarah Mowder, Senior Planner
Planning Department

Re: Planning Justification Brief – Zoning By-Law Amendment to Fulfil Condition 106
United Holdings Inc.
9408 Columbia Way, 0 Mount Hope Road, and 14320 Mount Hope Road
Related Town File Numbers: RZ 2026-0005, POPA-2025-004, 21T-25003C

Dear Ms. Mowder,

On behalf of our client, United Holdings Inc. (the "**Owner**"), KLM Planning Partners Inc. is pleased to submit the enclosed Planning Justification Brief in support of an application to amend the Town of Caledon Zoning By-law 2006-50, as amended, for lands west of Mount Hope Road and north of Columbia Way in the Town of Caledon (the "Subject Lands"). The Subject Lands are identified as Parts 1, 2 and 3 on the accompanying draft reference plan and illustrated on the proposed zoning schedule.

The Subject Lands are currently zoned Agricultural (A) and Environmental Policy Area 2 (EPA2). The proposed amendment would rezone the Agricultural portions to EPA2, establishing consistent environmental zoning across the Subject Lands. The application is intended to fulfil the protective zoning component of Condition 106 of the Mount Hope West Draft Plan of Subdivision approval (File 21T-25003C), granted on June 8, 2026.

Condition 106 requires the preparation and deposit of a Natural Heritage Conservation Plan delineating the Natural Environment System within the Greenbelt Natural Heritage System lands, including lands to be restored as enhancement or compensation for natural heritage features relocated from the adjacent Secondary Plan area. It also requires these lands to be placed within an appropriate protective zone to ensure their long-term protection.

The proposed amendment is informed by the Mount Hope West Local Subwatershed Study ("LSS"), which identifies existing natural heritage features, associated buffers, and lands for restoration, enhancement and compensation. The EPA2 zone category is proposed to support these environmental objectives while maintaining consistency with the existing environmental zoning and accommodating applicable existing-lot permissions.

This Brief describes the Subject Lands, the background and purpose of the application, and the proposed amendment. It assesses the application against the *Planning Act*, the *Provincial Planning Statement, 2024*, the Greenbelt Plan, the former Region of Peel Official Plan and the Future Caledon Official Plan and provides the planning rationale for the proposed zoning.

1.0 SUBJECT LANDS

The Subject Lands are located northwest of the intersection of Mount Hope Road and Columbia Way, immediately west of the Mount Hope West Secondary Plan area. They comprise two separate areas identified as Parts 1, 2 and 3 on the draft reference plan. The Subject Lands contain wetlands, a woodland, a tributary of Cold Creek and associated buffers, together with agricultural lands identified for restoration and compensation through the Local Subwatershed Study.

Surrounding land uses include:

- **North:** Agricultural and rural residential uses within the Greenbelt Plan area.
- **East:** The Mount Hope West Secondary Plan area and Mount Hope Road, beyond which are predominantly agricultural and rural residential uses.
- **West:** Agricultural lands and natural heritage features within the Greenbelt Plan area, and a future Urban Area (Mount Hope East)
- **South:** Columbia Way, beyond which is an existing low-rise residential subdivision.

2.0 PROPOSED AMENDMENT

On June 8, 2026, the Town of Caledon granted draft approval to the Mount Hope West Plan of Subdivision (File 21T-25003C), subject to 228 conditions. The Draft Plan provides for residential and commercial development, roads, parkland, stormwater management facilities and natural heritage blocks within the adjacent Mount Hope West Secondary Plan area (Official Plan Amendment File POPA 2025-0004). The Mount Hope West Secondary Plan has been consolidated into the Town's OP (July 2026 Consolidation) under Part H Site Specific Policies and Secondary Plans, Chapter 38.

A Local Subwatershed Study ("LSS") was prepared to support the Secondary Plan and subdivision applications by characterizing existing environmental conditions, assessing development impacts, and identifying protection, mitigation, restoration and monitoring measures. The LSS identifies the natural heritage features and associated buffers to be protected, together with the lands required for restoration, enhancement and compensation. These components form the proposed Natural Heritage System and provide the technical basis for delineating the lands to receive protective zoning.

Accordingly, the proposed Zoning By-law Amendment (the "**Proposed Amendment**") seeks to extend the EPA2 zoning to the Agricultural portions of the Subject Lands to address the protective zoning component of Condition 106 of the Draft Plan of Subdivision approval, which states:

1. *The Owner shall prepare and deposit a reference plan ("Natural Heritage Conservation Plan"), to the satisfaction of the Town, and at the Owner's expense, which delineates the Natural Environment System ("NES") within the Greenbelt NHS Lands, including lands to be restored as enhancement or compensation for Natural Heritage features removed from the Secondary Plan area in accordance with the approved LSS.*
2. *The Natural Heritage Conservation Plan lands identified on the reference plan, forming part of the Greenbelt NHS and restoration Lands, shall be zoned to the appropriate protective zone category (i.e., EPA1 or similar) to ensure long-term protection.*

The amendment would apply protective zoning to existing natural heritage features and associated buffers, together with the enhancement and compensation lands identified through the LSS. The lands proposed for rezoning are identified as Parts 1, 2 and 3 on the draft reference plan and illustrated on the proposed zoning schedule.

3.0 PLANNING ANALYSIS

The following sections review the applicable provisions of the *Planning Act*, Provincial Planning Statement, Greenbelt Plan, Region of Peel Official Plan, and the Town of Caledon Official Plan in support of the proposed amendment.

3.1 PLANNING ACT

The *Planning Act*, R.S.O. 1990, c. P.13, as amended (the "**Act**"), establishes Ontario's land use planning framework. Section 2 of the Act requires planning authorities to have regard to matters of provincial interest, including the protection of ecological systems, natural areas, features and functions, and the conservation and management of natural resources. Section 3(5) requires planning decisions to be consistent with applicable provincial policy statements and to conform with, or not conflict with, applicable provincial plans.

Section 51(25) of the Act authorizes an approval authority to impose reasonable conditions on subdivision approval, having regard to the nature of the proposed development. Condition 106 of the Mount Hope West Draft Plan approval requires protective zoning for the identified conservation lands. The proposed amendment would implement this requirement by placing the Subject Lands within the EPA2 Zone, using the Town's zoning authority under Section 34 of the Act.

By applying protective zoning to existing natural heritage features, associated buffers, and restoration, enhancement and compensation lands identified through the LSS, the proposed amendment has regard to the provincial interests identified in Sections 2(a) and 2(b) and implements the zoning component of Condition 106, advancing the subdivision toward final approval under Section 51(58) of the Act. Accordingly, the proposed amendment has regard to the matters of provincial interest set out in Section 2 and complies with the applicable requirements of the Planning Act.

3.2 PROVINCIAL PLANNING STATEMENT

The Provincial Planning Statement, 2024 (the "**PPS**"), issued under Section 3 of the *Planning Act*, came into effect on October 20, 2024 and provides provincial policy direction for land use planning and development. Pursuant to Section 3(5) of the Act, decisions in respect of planning matters must be consistent with the PPS. The following policies are relevant to the proposed protective rezoning.

Policy 4.1.1 of the PPS requires the long-term protection of natural features and areas, while Policy 4.1.2 supports maintaining, restoring or improving their connectivity, ecological functions and biodiversity. The LSS identifies retained wetlands, woodland and watercourse features, associated buffers, and lands for wetland creation, woodland restoration and native meadow establishment. The proposed EPA2 zoning would recognize these components within an environmental zone and permit environmental management activities that support their restoration. These controls would complement the natural heritage policies, including the no-negative-impact requirements of Policies 4.1.5 and 4.1.8 where applicable.

Policies 4.2.1 and 4.2.2 address the protection of water quality, quantity and hydrologic functions. The amendment would support these policies by applying environmental zoning to the lands identified through the LSS for feature protection and restoration, alongside the study's drainage, stormwater management and mitigation measures.

Section 5 of the PPS addresses the protection of public health and safety from natural and human-made hazards. Policy 5.1.1 directs development away from hazards presenting unacceptable risks, while Policy 5.2.2 generally directs development outside river and stream flooding and erosion hazards. Applying

environmental zoning to the identified watercourse corridor would support these objectives, with any proposed works remaining subject to applicable hazard assessments and regulatory requirements.

The amendment would also support rural biodiversity under Policy 2.5.1(g) and environmental protection under Policy 2.9.1(d). Together with the restoration and implementation requirements of the subdivision approval, the proposed EPA2 zoning would establish land use controls supporting the long-term conservation function of the Subject Lands. Accordingly, the proposed amendment is consistent with the applicable PPS policies.

3.3 GREENBELT PLAN

The Greenbelt Plan (the "**Greenbelt**") was established under the *Greenbelt Act, 2005*, S.O. 2005, c. 1, to protect agricultural lands, natural heritage systems and water resources. Section 7(1) of that Act requires decisions under the *Planning Act* to conform with the Greenbelt Plan. The Subject Lands are within the Protected Countryside and the Greenbelt Natural Heritage System.

Section 3.2.2 addresses the protection of natural heritage and hydrologic features, their ecological functions and connectivity. Section 3.2.5 generally prohibits development and site alteration within key natural heritage features, key hydrologic features and their vegetation protection zones, subject to specified exceptions. The proposed amendment supports these policies by extending environmental zoning to the lands identified through the LSS for protection, restoration, enhancement and compensation. The EPA2 zone permits environmental management activities supporting wetland creation, woodland restoration and native meadow establishment. Together with the subdivision's restoration requirements, the amendment would support the long-term protection and ecological connectivity of the conservation system.

The Subject Lands include vacant lands currently zoned Agricultural (A) and Environmental Policy Area 2 (EPA2) under the Town of Caledon Zoning By-law 2006-50, as amended. The EPA2 zone is proposed to extend the environmental zoning already applicable to portions of the Subject Lands, establishing a consistent zoning framework across the identified conservation lands. This approach would recognize their shared conservation function, and the EPA2 Zone would also accommodate the restoration measures identified through the LSS.

Accordingly, EPA2 is proposed as the appropriate protective category contemplated by Condition 106, which identifies "EPA1 or similar." Together with the delineation of the conservation lands and implementation of the restoration requirements, this approach recognizes both the environmental protection policies and existing-lot provisions of the Plan and supports conformity with the Greenbelt.

3.4 REGION OF PEEL AND TOWN OF CALEDON OFFICIAL PLAN

The *Future Caledon Official Plan* (the "**Caledon OP**") establishes the Town's land use and growth management framework to 2051. Schedule B4 identifies the Subject Lands as Rural and Natural Features and Areas, while Schedule D1 identifies Natural Features and Areas, Supporting Features and Areas, and streams. The lands are adjacent to the Mount Hope West Secondary Plan area.

The Caledon OP was adopted by Town Council on March 26, 2024, and approved by the Minister of Municipal Affairs and Housing on October 22, 2025, with modifications addressing the *Provincial Planning Statement, 2024* and the revocation of the *Growth Plan for the Greater Golden Horseshoe*. Effective July 1, 2024, Peel became an upper-tier municipality without planning responsibilities. Pursuant to subsection 70.13(2) of the *Planning Act*, the applicable portions of the former *Region of Peel Official Plan* ("**PROP**") were deemed to constitute an Official Plan of the Town. The Caledon OP clarifies that its policies prevail where they conflict with the former PROP. Accordingly, the two Plans are considered together in assessing the amendment.

3.4.1 Natural Heritage Protection and Restoration

As described in the LSS, the western Greenbelt lands are included within the Greenlands System on PROP Schedule C-1, with portions mapped as Core Areas on Schedule C-2. Caledon OP Policies 13.3.1 and 13.4.1 connect the Town's Natural Features and Areas and Supporting Features and Areas designations to the corresponding PROP Greenlands System components. Applying EPA2 zoning would implement this framework through land use controls reflecting the conservation limits identified through the LSS and draft reference plan.

PROP Policy 2.14.8 directs the maintenance, restoration and improvement of the system's diversity, connectivity, ecological functions and biodiversity. Policies 2.14.19(h) and 2.14.20 recognize enhancement areas, buffers and linkages and provide for their protection and restoration. The proposed amendment supports these objectives by extending environmental zoning to retained features and supporting lands, with environmental management permissions accommodating the restoration measures identified through the LSS.

Caledon OP Policies 13.4.7–13.4.11 provide for evaluating supporting features and enhancement areas through detailed studies. These provisions support including the Rural portions identified through the LSS for restoration and compensation within the environmental zone, recognizing their intended contribution to the restored system. Policy 17.10.2(a) also requires uses, development and site alteration on Rural lands within the Greenbelt to conform with the Greenbelt Plan. The Rural designation therefore operates alongside the applicable natural heritage and provincial requirements.

PROP Policy 2.14.40 supports ecosystem compensation where accepted as a mitigation measure, subject to applicable policy requirements, seeking no net loss and, where possible, a net gain in feature area or function. The amendment would support the LSS compensation strategy by applying environmental zoning to lands intended for wetland creation, woodland restoration and native meadow establishment. Detailed design, implementation and monitoring would continue through the subdivision approval process.

The amendment also supports the water resource protection framework in PROP Section 2.6 and Caledon OP Section 13.11 by recognizing the wetlands, watercourse corridor and associated supporting lands identified through the LSS. Environmental zoning would complement the study's water balance, drainage and mitigation measures in protecting hydrologic functions.

3.4.2 Official Plan Conformity

The proposed EPA2 zone would extend the environmental zoning already applicable to portions of the Subject Lands, establishing a consistent zoning framework across the identified conservation system. It would also accommodate qualifying existing-lot dwelling permissions recognized by Caledon OP Policy 13.3.3(i) and PROP Policy 2.12.16.23(b). Where the historical criteria are satisfied, this approach would avoid unnecessarily removing a dwelling permission through an amendment intended to implement conservation requirements. Any future proposal would remain subject to Caledon OP Policies 13.3.4 and 13.3.5 and the applicable Greenbelt-specific restrictions in Section 13.5.

Together with the delineation of the conservation lands and implementation of the subdivision's restoration requirements, the proposed EPA2 zoning would support the long-term protection and enhancement of the identified natural system. On this basis, the amendment conforms with the applicable policies of the Caledon OP and former PROP.

3.5 TOWN OF CALEDON ZONING BY-LAW 2006-50

The Subject Lands are currently zoned Agricultural (A) and Environmental Policy Area 2 (EPA2) under the Town of Caledon Zoning By-law 2006-50, as amended. The proposed amendment would extend EPA2 zoning to the Agricultural portions, establishing consistent environmental zoning across the conservation lands identified as Parts 1, 2 and 3 on the draft reference plan and illustrated on the proposed zoning schedule.

Section 11 of the Town's Zoning By-law establishes the permitted uses and development standards for Environmental Policy Area zones. Table 11.1 permits environmental management, forest management, existing farms and non-intensive recreation within EPA2, together with specified residential and accessory uses. Section 11.1 restricts uses to those expressly permitted, subject to the standards in Table 11.2 and the applicable general provisions.

The By-law defines environmental management to include the protection, maintenance, enhancement and restoration of ecosystem forms and functions, including wetland restoration and creation, vegetative planting and watercourse rehabilitation. These permissions directly accommodate the restoration and compensation measures identified through the LSS. Extending EPA2 zoning would therefore recognize the conservation function of existing features, associated buffers and additional lands intended to support the restored system.

EPA2 also permits detached dwellings, accommodating qualifying existing-lot permissions recognized by the Greenbelt Plan and Official Plan. Its application would maintain consistency with the existing EPA2 portions while avoiding the unnecessary removal of a qualifying dwelling permission through an amendment intended to implement environmental protection. No dwelling is proposed through this application, and any future development would remain subject to applicable planning policies, zoning provisions and regulatory approvals.

The amendment would build upon the existing environmental zoning to encompass the conservation system delineated on the draft reference plan. Together with the subdivision's restoration and implementation requirements, the proposed EPA2 zoning is intended to address the protective zoning component of Condition 106 and support the long-term protection of the Subject Lands and their ecological functions.

4.0 SUPPORTING MATERIALS

In support of this submission for Zoning By-law Amendment, GEI Consultants Canada has prepared a restoration design package inclusive of a Restoration Design Brief ("the Brief") and a Wetland Feature-Based Water Balance Assessment. The Brief is informed by the conceptual restoration and compensation strategy, the monitoring plan, and the adaptive management framework outlined in the Local Subwatershed Study. The Brief documents the proposed wetland, woodland, and meadow restoration and compensation, including the locations, planting prescriptions, implementation requirements, and refined monitoring and adaptive management framework. The restoration and compensation outlined through the Brief informed the lands to be included in the Zoning By-law Amendment Application.

The proposed restoration approach integrates appropriate grading and hydrological conditions, soil preparation, diverse native plantings, invasive species management, wildlife habitat features, ecological connectivity, and measures to protect retained natural heritage features.

Implementation of the restoration design will be supported by a five-year ecological monitoring and adaptive management program, including construction monitoring, compliance monitoring, and performance monitoring. The restoration areas are intended to develop toward diverse, resilient, and increasingly self-sustaining ecological communities that complement and enhance the Proposed NHS.

5.0 CONCLUSION

Based on the foregoing analysis, the proposed Zoning By-law Amendment is consistent with the Provincial Planning Statement, 2024 and conforms with the applicable policies of the Greenbelt Plan, former Region of Peel Official Plan and Future Caledon Official Plan. The proposed amendment would extend the existing EPA2 zoning across the identified conservation lands, supporting the protection of natural heritage features, associated buffers and lands identified through the LSS for restoration,

enhancement and compensation. Together with the subdivision's restoration requirements, the amendment would support the long-term conservation function of these lands and address the protective zoning component of Condition 106 of the Mount Hope West Draft Plan of Subdivision approval. Accordingly, it is our opinion that the proposed amendment is appropriate for the Subject Lands and represents good land use planning.

As such, please find enclosed the following materials in support of the application:

1. Zoning By-law Amendment Application Form;
2. Scan of the Zoning By-law Amendment Fee;
3. Planning Justification Letter prepared by KLM Planning Partners Inc. dated October 29, 2026;
4. Draft Zoning By-law Amendment prepared by KLM Planning Partners Inc. dated October 29, 2026;
5. Draft Reference Plan – Compensation Lands prepared by R-PE Surveying Ltd.;
6. Restoration Design Brief prepared by GEI Consultants Canada dated October 23, 2026; and,
7. Wetland Feature-Based Water Balance Assessment prepared by GEI Consultants Canada dated October 23, 2026.

We trust that the enclosed materials are satisfactory and we look forward to working with staff on this proposed Zoning By-law Amendment. Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

KLM PLANNING PARTNERS INC.

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Copy to: Keith MacKinnon, Partner, KLM Planning Partners Inc.
Client